

**Torfaen LDP Draft Review Report of Consultation - April 2018**

Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
<b>Q1. Does the Review Report identify all the key contextual issues?</b>			
<b>Asbri Planning on behalf of Pobl (DRR003)</b>	<p>Asbri on behalf of Pobl Group have prepared a response prepared in the context of land which is being promoted at Cefn Perthy farm, Cwmbran with an initial vision document submitted for the site.</p> <p>A major issue emerging from this section relates to timescales for implementation of various plans including the NDF, SDP and replacement LDP, which are of increasing importance given the housing land supply shortfall. The AMR points to delays in bringing forward strategic sites. It is apparent therefore that long lead in time for the development of strategic allocations was not factored into the original LDP process.</p> <p>There is a consequent need therefore to consider potential strategic site allocations at an early stage and in particular those sites which relate well to the <i>existing settlement pattern, are supported by organisations with a track record of delivering both affordable and market housing, are relatively unconstrained when compared to other potential areas.</i></p> <p>There is no reference to any mechanism as to how such sites can be promoted through a future SDP, if this is to be the means to consider such sites. It is frustrating as despite the need to begin evidence gathering, some indication from the Council is needed to generate sufficient confidence that if necessary work is undertaken the authority will respond accordingly. Requests for meetings to discuss how a large strategic development can be brought forward, have to date met with reluctance pending the outcome of the review process.</p> <p>It is in the above context that we are submitting with this representation a promotion document which sets out the vision for the site at Cefn Perthy.</p>	<p>Comments Noted.</p> <p>The Delivery Agreement will cover the timetable for the submission of candidate sites. The LDP Strategy will consider issues of what type of housing sites should be allocated i.e. location and sizes etc.</p>	<p>No further action required as regards the proposed LDP Review Report.</p>
<b>CPRW (DRR004)</b>	<p>Maybe in terms of planning guidance all the required issues are there, but for those of us (many residents) who are concerned about environmental sustainability, there is little or no discussion about retention of countryside and green spaces and limiting greenfield development</p>	<p>Comments Noted. The purpose of the review report is about what process is used to review the LDP. The comments raised are detail issues which will be considered</p>	<p>No further changes required to the LDP Review Report.</p>

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		once the review of the LDP begins.	
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	Yes	Comments welcomed	No further action required as regards the proposed LDP Review Report
<b>Cyfoeth Naturiol Cymru / Natural Resources Wales (DRR007)</b>	Yes, section 2 of the report appears to include the key changes in Policy and Legislation.	Comments welcomed	No further action required as regards the proposed LDP Review Report
<b>Hazel Clatworthy (DRR008)</b>	Yes. The Wellbeing of Future Generations Act is particularly significant since it requires local authorities to improve social, economic, environmental and cultural wellbeing. I believe that policy M3 is contrary to all these aspects of wellbeing in Torfaen.	Support for the content of the contextual issues welcomed. Representors views regarding Policy M3 noted	No further action required as regards the proposed LDP Review Report.
<b>Torfaen CBC Housing Strategy (DRR009)</b>	<p>Identified a range of national, regional and local plans and policies that should be included in the key contextual issues to be considered in the review of the LDP:</p> <p>National - Renting Homes Wales Act, The homelessness Wales Order 2015, Mobile Homes Wales Act (2013), Social Services and Well Being Act 2014, Well Being and Future Generation Act 2015, Violence against Woman, Domestic Abuse and Sexual Violence Wales Act 2015.</p> <p>Regional - 2015 Child Poverty, Gwent Homelessness Strategy, Gwent Supporting People Regional Commissioning Plan, Gwent Violence against Woman, domestic abuse and Sexual Violence Strategy, Cardiff Capital Regional City Deal</p> <p>Local - Torfaen Corporate Plan 3, Housing Renewal Strategy and Policy, Private rented Sector Strategy, Every House Counts – Empty of Property Strategy, Gypsy and Traveller Accommodation Assessment, Supporting People Strategy, Financial Inclusion Strategy for Torfaen, Public Service Board - Assessment of Well Being, RSL Corporate Business Plans</p>	Comments welcomed - The LDP AMR 2016 and 2017 and also the LDP Review Report have considered the key strategic plans of importance for the LDP Review (i.e. Well Being Future Generations Act, Cardiff Capital City Deal, Corporate Plan 3, Gypsy and Traveller Accommodation Assessment. The	No further action required as regards the proposed LDP Review Report.

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		implications of the remaining plans identified will be reviewed as part of the SA/SEA process for the LDP Review.	
<b>Home Builders Federation (DRR010)</b>	The HBF considers that all of the main issues have been identified, however feel that some of these could be dealt with in more detail, particularly those relating to the under delivery of housing, which is identified as one of the main issues with the current plan.	Comment Noted - Additional detail added to the main issues.	Paragraph 4.2.11 has been amended accordingly
<b>Coal Authority (DRR012)</b>	No specific comments to make	Noted	No further action required as regards the proposed LDP Review Report.
<b>Theatres Trust (DRR013)</b>	Most aspects of the contextual issues raised are outside of the Trust's remit and expertise although the need to accord with the Well-being of Future Generations Act (2015), particularly in relation to cultural well-being, is noted and supported.	Comment and support noted	No further action required as regards the proposed LDP Review Report.
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	Yes-we agree that all key contextual issues are being considered	Comment and support noted	No further action required as regards the proposed LDP Review Report
<b>Bron Afon (DRR016)</b>	Yes it seems to have captured very well the regional and local context, challenges and opportunities the area faces.	Comment and support noted and welcomed	No further action required as regards the proposed LDP Review Report
<b>Yvonne Walker (DRR017)</b>	The respondent made a number of detailed site specific comments which are considered more appropriate to be dealt with under Question 4 In respect to SAA2 - Canalside,, SAA5 - The British, SAA6 - South Sebastopol, M3 - Tir Pentwys Preferred Area for Aggregates HA/1 Rose Cottage Gypsy & Traveller Site  None of the above have demonstrated any sustainable development or promoted any welllbeing. We have been robbed of green spaces. Llanhilleth Common is	Comments are considered to relate more to Question 4.  It should also be noted that SAA2 Canalside relates to a specific area rather than the entire	No further action required as regards the proposed LDP Review Report

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	<p>under threat if the appeal regarding Tir Pentwys is granted in favour of the appellants.</p> <p>The Canalside Area &amp; loss of green space is sorely felt at SAA6. Potential buyers have to pay the developer to install street lights and cutting of verges. The rural location at Bevans Lane has been changed into an urban sprawl.</p> <p>HA/1 There have been serious crime and social issues regarding this planning application</p>	<p>section of Canal in Torfaen.</p>	
<p><b>South Wales Fire and Rescue (DRR018)</b></p>	<p>Yes, the main contextual issues are covered in the draft review. However, there is no mention of the need to consider provision of adapted living properties to meet the needs of the aging population which will undoubtedly accompany the increase in general population.</p> <p>The prospective growth in the number of domestic dwellings in Torfaen have the potential to increase risk in the domestic dwelling profile, further computer modelling (FSEC) will be required.</p> <p>Welsh Government have placed a target on recycling for all UA's of 64% by 2019-20 however is there scope for job opportunities to utilise the recycled products thus meeting several Well-being objectives contributing to a Prosperous Wales and a more Resilient Wales.</p>	<p>Comments welcomed and additional reference to the impact of ageing population will be added to the review report. South Wales Fire and Rescue will be engaged through the LDP Review Process in terms of the LDP growth strategy.</p>	<p>Additional text to be added to 4.2.20</p>
<p><b>CADW (DRR020)</b></p>	<p>We have no substantive comments to make but are pleased to note that the provisions of the Historic Environment (Wales) Act 2016 will be taken into account along with the revised PPW chapter on the historic environment and the new Technical Advice Note 24: The Historic Environment. You may also find it useful to reference our guidance documents which can be found here: <a href="http://cadw.gov.wales/historicenvironment/publications/newpublications/?lang=en">http://cadw.gov.wales/historicenvironment/publications/newpublications/?lang=en</a></p>	<p>Comments and support welcomed and noted</p>	<p>No further action required as regards the proposed LDP Review Report</p>
<p><b>Torfaen Friends of the Earth (DRR021)</b></p>	<p>Active Travel Plan for Torfaen. Active Travel (Wales) Act 2013 Nb Page 47 T3</p>	<p>Comment Noted - It is agreed the Active Travel Act and Active Travel Plan is a key document to inform the LDP Review. Whilst not included in Chapter 1 it is covered in Page 47 of the AMR. However it is agreed that</p>	<p>Additional detail on the Active Travel Act to be included in Chapter 2 (see new paragraph 2.30)</p>

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		reference to it in the key contextual issues useful	
<b>Q2. Does the existing LDP Vision and Objectives remain appropriate for a revised plan (see section 4.1)</b>			
<b>Asbri Planning on behalf of Pobl Group (DRR003)</b>	The wording to the effect of <i>'through collaborative working, the development strategy for the Torfaen Local Development Plan will deliver planned, sustainable growth reflecting the specific role and function of settlements'</i> will remain broadly appropriate but with an extended plan period. There may however be a need to emphasise the deliverability elements by stating .. <i>'through collaborative working and an emphasis on areas attractive to developers, the development strategy will....</i>	Broad support welcomed. Detailed proposed amendments to the LDP Vision are noted and will be considered as part of the LDP Visioning exercise at the outset of the plan review process.	No further action required as regards the proposed LDP Review Report
<b>CPRW (DRR004)</b>	No. It almost ignores the rural, landscape and natural ecology of Torfaen. The inclusion of the words 'sustainable growth' (which has conflicting definitions) and '...protecting and enhancing Torfaen's unique natural heritage and cultural and historic identity' is insufficient to assure those of us (members of the various conservation organisations and many others), who value the natural environment of Wales, that this local authority will not continue to pursue unsustainable growth and .massive loss of open countryside, as at South Sebastopol (which blatantly destroys a vital '...connected network of natural areas' mentioned as a requirement in the LWBP), and the other large areas of targeted greenfield development in the current LDP. CPRW does not accept this Vision is in accordance with the Well-being of Future Generations (Wales) Act, and it should be strengthened to show a clear determination to safeguard the remaining Torfaen countryside, and open spaces in urban areas, for our children and grandchildren. Your ecologist may assist with this.	Comments Noted that the Vision needs to be strengthened. . Proposed amendments to the LDP Vision are noted and will be considered as part of the LDP Visioning exercise at the outset of the plan review process.	No change required to the LDP Review Report
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	Yes, but there should be emphasis upon the distinctiveness of the area and not subsumed within the generic Cardiff Area.	Broad support welcomed. Comments relating to local distinctiveness to inform the LDP Visioning exercise at the outset of the plan review process	No change required to the LDP Review Report

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<b>Cyfoeth Naturiol Cymru / Natural Resources Wales (DRR007)</b>	We welcome that you have assessed the existing LDP objectives against the draft well-being goals. There is nothing to suggest, in our view, that any fundamental changes to the objectives are necessary. However, we support the possibility of amending the wording of the objectives to ensure they are compatible with the final Local Well-Being Plan objectives, as stated in 4.17.	Comment noted and support welcomed	No change required to the LDP Review Report
<b>Torfaen Housing Strategy (DRR009)</b>	Housing is happy that the vision and objectives remain appropriate for the revised plan	Comments noted and welcomed	No change required to the LDP Review Report
<b>Home Builders Federation (DRR010)</b>	The HBF supports the Councils suggestion that there may need to be some wording amendments to ensure alignment with the WBFGA.	Comments noted and welcomed	No change required to the LDP Review Report
<b>Coal Authority (DRR012)</b>	No specific comments to make	Noted	No change required to the LDP Review Report
<b>Theatres Trust (DRR013)</b>	<p>The existing Vision and Objectives remain appropriate in general, although in light of the Well-being of Future Generations Act (2015) defining the improvement of cultural wellbeing as part of sustainable development and describing vibrant culture as being one of its seven goals the revised plan if taken forward ought to give greater prominence to the promotion and protection of arts and cultural venues in the borough. For example, Objective 2 could be amended as set out below:</p> <p>2. To promote health and well-being through the provision of development including community <b>and cultural</b> facilities, leisure and outdoor recreational opportunities, accessible to all.</p>	Comments noted. The promotion of cultural wellbeing should inform the generation of LDP objectives as part of the LDP Review however noting that LDP objective 7 promotes the conservation and enhancement of cultural resources.	No change required to the LDP Review Report
<b>Stride Treglown on behalf of Pontypool</b>	The existing LDP Vision and Objectives remains appropriate providing consideration is adequately given to strategic objectives such as the Well Being and Future Generations Act. It appears that the Council have given adequate consideration to this in their review process.	Comment noted and support welcomed	No change required to the LDP Review Report

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<b>College (DRR014)</b>			
<b>Bron Afon (DRR016)</b>	<p>The vision for housing remains sound, exploring the opportunities to deliver the quantum of new homes in the immediate and longer term is inevitably challenging. Infrastructure may be a limiting factor.</p> <p>The effect of ceasing the Severn Bridge tolls on the areas needs to be fully explored.</p>	Comments noted and the issues identified will be to consider as part of the LDP Review	No change required to the LDP Review Report
<b>Yvonne Walker (DRR017)</b>	The respondent made a number of detailed site specific comments which are considered more appropriate to be dealt with under Question 4	Comments are considered to relate more to Question 4	No change required to the LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	Yes, the vision and objectives are appropriate for the revised plan. It is noted, that only one of the LDP objectives links to a 'Healthier Wales'. With health and well-being being one of the most significant areas requiring thought in future planning should there be more emphasis on promoting healthier options across all objectives?	Comments and support noted. The promotion of health and wellbeing should inform the generation of LDP objectives as part of the LDP Review.	No change required to the LDP Review Report
<b>Torfaen Friends of the Earth (DRR021)</b>	Would welcome a higher priority in Figure 2 for environmental and biodiversity protection, resilience and sustainability	Comments noted. It is considered the objectives promote environmental and biodiversity protection and sustainability, however the review of objectives will be undertaken as part of the LDP review process	No change required to the LDP Review Report
<b>Q3. Do you agree that the existing LDP Spatial Strategy needs to be reviewed? (see section 4.2)</b>			
<b>Asbri Planning on behalf of Pobl Group (DRR003)</b>	The importance of Cwmbran needs to be retained. Paragraph 4.2.4 is particularly supported, as it emphasises that 'Cwmbran continues to act as a strategic driver for Torfaen and the development strategy should seek to take advantage of the opportunities presented by City Deal, Valleys Task Force and the potential	Comment noted and support welcomed. The LDP Review will consider the opportunities presented by City Deal,	No change required to the LDP Review Report

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	opportunities provided by the abolition of the Severn Bridge tolls which may place additional demand for development within Torfaen.'	Valleys Task Force and the abolition of the Severn Bridge tolls as part of the review of the Strategy.	
<b>CPRW (DRR004)</b>	The restricted TAN brief does not appear to address WFG Act requirements in respect of the natural environment in the inclusion of sites. Surely there are some sites where development should be constrained because of environmental or amenity conditions, such as at South Sebastopol? Are these taken into account?	Comment noted.	No change required to the LDP Review Report
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	<p>At paragraph 4.16 of the review of the Vision and Objectives the importance is noted of a spatial strategy that delivers accessibility and connectivity and which promotes sustainable communities. The Mamhilad allocation is patently unsustainable with poor connections to adjoining communities. Moreover, the lack of delivery at that site has highlighted the difficulties of delivering a robust strategy that is dependent on a single large site, the majority of which is in a single ownership. The unsustainability of the allocation in terms of the requirements of the Well Being Act and the historic failure of that site to deliver signals that the strategy needs to be revised to focus new housing on smaller sites better related to existing settlements that are demonstrably deliverable.</p> <p>It is also considered that the aim of the Council to deliver 40.3 hectares of employment land and 35ha of strategic employment land over the plan period is overly ambitious.</p> <p>Indeed the delivery data suggests (with only 7.5% of these allocations developed) there appears to be little contextual realism as to the quantum of space actually required by the market.</p> <p>The quantitative shortfall has not been helped by the fact that some of sites allocated in the LDP, including a site owned by the representor at Craig y Felin, were allocated without regard to whether they would be available for such uses. However, even setting such sites aside, the quantum of space available is far in excess of the realistic need.</p> <p>The evidence shows that strategic inward investment into Torfaen, as in other similarly valley County Boroughs, is limited. This is unlikely to change in a positive direction following Brexit and other economic changes.</p> <p>The "Cardiff Capital Region City" approach reflects the dominance of Cardiff in the employment market of South Wales, it can already be seen that office</p>	<p>Comment noted.</p> <p>The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites. However, it should be noted that the LDP will remain the Development Plan until 31st March 2021. Thus existing allocation can still be brought forward in line with the LDP.</p>	No change required to the LDP Review Report



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	<p>development is migrating from peripheral areas such as Langstone to Cardiff City Centre and areas closer to the City on the M4 corridor. Torfaen cannot compete with the locational advantages of Cardiff and the M4 corridor and must therefore find its own strengths and opportunities to differentiate itself.</p> <p>In the view of the representor, the “aspirational” focus on bio hubs and knowledge chains ignores the reality of demands for space in Torfaen. It is considered that an effective strategy is one that, builds on the strengths of Torfaen, of nurturing existing businesses, having established and well serviced employment parks away from residential areas (such as at Mamhilad, which inexplicably is proposed to be lost to housing). Such a strategy would also focus on providing a low cost base for new businesses to set up and expand through a good choice of small employment sites in non-prime locations but serviced and accessible by non-car modes and close to existing facilities.</p> <p>The proposed employment land review is welcomed and ought to be focused on Torfaen’s particular USPs and not be generic in its approach nor led astray by aspirational sectors for which demand is untested.</p>		
<b>Cyfoeth Naturiol Cymru / Natural Resources Wales (DRR007)</b>	<p>On the basis that your key policy indicator targets are not being achieved (as per 3.6), it appears that the LDP spatial strategy should be reviewed.</p>	<p>Comment noted.</p>	<p>No change required to the LDP Review Report</p>
<b>Torfaen Housing Strategy (DRR009)</b>	<p>Housing fully supports the review of the LDP Spatial Strategy for the following reasons</p> <p>A number of strategic sites still remain undelivered, this is typically on the basis of site viability and unrealistic expectations of land owner. Any Strategic sites included in the new LDP should be fully assessed for viability and realistic land values discussed and agreed with the landowner prior to inclusion.</p> <p>The risk associate without having a 5 year land supplies puts at risk the delivery of affordable housing and we therefore support the review for this purpose.</p> <p>In relation to point 4.2.21 it should be noted that a significant amount of the affordable housing delivery has been undertaken by Registered Social Landlords</p>	<p>Comment noted.</p> <p>The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites. However, it should be noted that the LDP will remain the Development Plan until 31st March 2021. Thus existing allocation can still</p>	<p>Agree that paragraph 4.2.23 (former para 4.2.21) on affordable housing delivery should be amended accordingly.</p>

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	<p>utilising social housing grant and has not been delivered through the LDP/planning process</p> <p>In relation to point 4.2.26 only 7.5% of employment/business land has been developed, Housing would request that any employment/business/industrial sites which have not been allocated for this purposes be considered for residential use.</p>	<p>be brought forward in line with the LDP</p> <p>Agree that par 4.2.21 needs amending,</p>	
<b>Home Builders Federation (DRR010)</b>	<p>The HBF supports the review of the Spatial Strategy, particularly with regard to the north of the borough for the reasons the Council identify in para. 4.2.4 of the report.</p>	<p>Comment noted</p>	<p>No change required to the LDP Review Report</p>
<b>Coal Authority (DRR012)</b>	<p>No specific comments to make</p>		
<b>Theatres Trust (DRR013)</b>	<p>Should the Spatial Strategy be reviewed, the Trust supports the continued promotion of new cultural and leisure development such as was directed towards Cwmbran.</p>	<p>Comment noted</p>	<p>No change required to the LDP Review Report</p>
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	<p>We agree that the LDP Spatial Strategy should continue to promote the growth hubs of Cwmbran and Pontypool. There is an opportunity for these areas to grow and provide a population to directly sustain the retail centres and leisure facilities within these areas and further afield within the County Borough and beyond.</p> <p>Before the spatial strategy is reviewed a full re-assessment of allocations should be made in light of information that has come forward as part of this consultation. Those that have historically seen little movement within the plan period require re-assessing before being discounted or removed from future versions of the LDP as situations may have changed, this conversely applies to sites identified for potential removal from the LDP that have since provided evidence that the situation has changed and they are realistic and deliverable allocations within the revised plan period.</p> <p>One such site is Coleg Gwent's Pontypool College (Allocation H2/3), which although identified for coming forward for development within the final phase of the plan 2016/17 - 2020/21, has until recently not demonstrated any realistic prospect of being delivered - this has now changed, further details are provided within the final section of this form. The Pontypool College site presents an opportunity to achieve the objectives for Pontypool as a growth hub and to deliver approximately 140 dwellings.</p>	<p>Comment noted.</p> <p>The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites. However, it should be noted that the LDP will remain the Development Plan until 31st March 2021. Thus existing allocation can still be brought forward in line with the LDP</p>	<p>No change required to the LDP Review Report</p>

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<b>Bron Afon (DRR016)</b>	The aims remain sound and we would welcome working with TCBC to assist in delivery which remains challenging.	Comment noted and support welcomed	No change required to the LDP Review Report
<b>Yvonne Walker (DRR017)</b>	The British should be left CLEAN & GREEN - No development is appropriate	Comment noted. The regeneration strategy for The British site will investigate the potential development options.	No change required to the LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	Strongly agree, with the amount and variety of growth and development plans referred to in the LDP it will be essential to review the spatial strategy to ensure the infrastructure is in place to support changes. Public Services, Public transport, access to employment and suitable and sufficient housing will need to be continually aligned to maintain the flow of a vibrant and progressive community, and prevent everyone coming to a grinding halt.	Comment noted and support welcomed	No change required to the LDP Review Report
<b>Torfaen Friends of the Earth (DRR021)</b>	Pontypool continues to suffer because of Cwmbran focus. Blaenavon has potential through World Heritage Status. Pontypool is an historic town with strong architectural features which should be exploited to attract investment.	Comment noted	No change required to the LDP Review Report
<b>Q4. Do you agree that the main issues that should be considered in the review of the LDP have been identified? (see section 4.3 and 4.4)</b>			
<b>Asbri Planning on behalf of Pobl (DRR003)</b>	Those longstanding allocations referred to should no longer be considered as contributing to housing land targets and should be deleted accordingly. They should however remain in the urban boundaries and included in a suitable allowance for 'windfall' development.	Comment noted. The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites. However, it should be noted that the LDP will remain the Development Plan until 31 <sup>st</sup> March 2021. Thus existing allocation can still be brought forward in line with the LDP.	No change required to the LDP Review Report

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<b>CPRW (DRR004)</b>	<p>S1 - ‘...review of the need for the Urban Boundary ...’ I am unclear what this means, is it proposed to abolish urban boundaries?</p> <p>S2 - CPRW does not agree that the LDP addresses environmental SD at all adequately, as our comments above</p> <p>S3 - CPRW and many others are very concerned about the proliferation of solar ‘farms’ in open countryside, primarily for financial gain, not climate change. Solar panels should be on industrial and domestic roofs, not covering agricultural or amenity land.</p> <p>There are other factors causing climate change - use of fossil fuels, particularly vehicles (which are also producing worrying pollution &amp; health concerns) - to be addressed.</p> <p>S5 - housing provision continues to be a main concern to CPRW. It is acknowledged that LAs work within national policies, but there are a number of fundamental issues in this area that have never been clarified: -</p> <ul style="list-style-type: none"> <li>▪ Housing for Torfaen needs should be for the existing community, not for some notional need for jobs / economic growth that never seems to be achieved.</li> <li>▪ If there is an element of economic growth that inflates housing figures, this should be based on a LDP Business Plan, that can be assessed in the annual monitoring report; if economic growth is less, then housing requirements should be reduced accordingly</li> <li>▪ Use of greenfield land is ultimately unsustainable, it is a finite resource, cannot be created. Welsh countryside should be seen as precious and necessary as rainforests.</li> <li>▪ Affordable housing - never seems to be achieved as required, developers always win - note their profits. Torfaen should build its own housing for local needs</li> <li>▪ Infrastructure for proposed development is never adequately assessed, this is not in compliance with WFG Act. More than just obvious infrastructure, the consequences on health provision, pollution, schools, amenities, social services, waste collection and all the rest should be included, assessed and costed to avoid burdening future generations</li> </ul> <p>H4 - The action proposed is certainly needed, I hope it results in the necessary affordable allocations being achieved</p>	<p>Comments Noted.</p> <p>These comments are of a very detailed nature about the operation of policies from the perspective a pressure group. A review of policies contained in the LDP will be undertaken as part of the LDP review. However, the review will be undertaken on a holistic basis considering all elements of sustainable development.</p>	<p>No change required to the LDP Review Report</p>

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	<p>H5 - the Planning Committee members require training on what is the 'required provision', – they approved a Bron Afon application to develop on a children's informal play area in St Cadoc's that reduced the informal play area for the estate to below the advisory minimum</p> <p>H6 - I am aware that some if this is taking place in Pontypool town centre (by Melin - unlike Bron Afon which appears to have an anti-community policy</p> <p>M4 - The Tirpentwys Cut proposal should be abandoned whatever the result of the current Appeal - this ridge should be a Special Landscape Area, not permanently changed to completely incompatible industrial area. CPRW does not understand why this part of the ridge was assessed differently to the area to the north, and would like to see the assessment. We also believe that after the 20-year operation period mentioned by the applicant, the area would ever be returned to open countryside. If this industrial use with its associated brutal access infrastructure is allowed, it will illustrate that the Authority's stated policy of '...protecting and enhancing Torfaen's unique natural heritage and cultural and historic identity' is meaningless rhetoric.</p> <p>CF3 - if this includes schools, it is clear that many Torfaen residents have not agreed with the many ruthless closures and mergers experienced in Torfaen over recent years, Victoria Village recently. Again, it is unclear whether the inevitable consequences of these, which inevitably lead to pupils and teachers travelling further, more traffic congestion, other social disruption, have been properly assessed and taken into account.</p> <p>CF4/5 - CPRW is often asked to support residents objecting to loss of urban green spaces, such as the lost play area referred to in H5 above. We note also several other green spaces that have generated local objection against development proposed by Bron Afon Community Housing (which we have heard better described as an 'anti-community organisation') We cannot therefore agree that this policy is functioning effectively, but we welcome mention of a study. We would suggest a general moratorium on development of all urban green spaces - it is acknowledged that Cwmbran New Town was planned with much integrated green space – CPRW considers that this excellent planning concept must not be sacrificed. I would add that one reason for the loss of the play area in St Cadocs was that the area was 'undesigned'. This was a clear planning failure - the area</p>		

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	<p>should have been designated as leisure / amenity, and that would have defended it against the inappropriate development.</p> <p>C1 - this is of great concern to CPRW, widespread community concerns that the South Sebastopol area should have been so designated was ignored, and New Town planning abandoned. It is hoped that the days of bad community planning in Torfaen are over, and more conservation such as Green Wedges are implemented</p> <p>C2 - SLAs are welcomed and should be retained as an important part of the '...protecting and enhancing Torfaen's unique natural heritage and cultural and historic identity' policy. I have referred above to CPRW's view on the lack of this designation in the area of the Tirpentwys Cut. Around the Folly Tower there is no SLA designation despite a CADW designation - CPRW's view is that it is peculiar that the CADW designation is not reflected in the LDP SLA designation</p> <p>C3 - RDP is not very effective</p> <p>HE1 - It is very apparent that TCBC does not properly value its built heritage - loss of Pontypool Hospital and the Georgian building at the Trevethin school site to name two, and railway artefacts south of Blaenavon are almost non-existent. The LA should encourage the formation of a Torfaen Civic Society.</p>		
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	<p>Housing and employment are acknowledged by the representor as the key issues but it is noted (as referred to above) that these ought to be considered more thoroughly against the evidence base of Torfaen's realistic employment needs and potential and within the sustainable development framework set by national guidance.</p> <p>The representor does not agree that SAA4 'Mamhilad, Pontypool' is simply behind schedule. It is evident from the lack of progression of the planning application that this is more properly described as 'Limited progress and allocation to be reviewed.'</p>	<p>The Review of the LDP will be based on updated evidence base including housing and employment.</p> <p>The Council disagrees on the request to change the status of the delivery of the SAA4 allocation given that a planning application has been submitted for the site and therefore, progress has been made.</p>	<p>No change required to the LDP Review Report</p>
<b>Cyfoeth Naturiol Cymru / Natural Resources</b>	<p>Yes. We do not have anything further to suggest</p>	<p>Comments noted and welcomed</p>	<p>No change required to the LDP Review Report</p>

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<b>Wales (DRR007)</b>			
<b>Torfaen Housing Strategy (DRR009)</b>	<p>Housing supports that the main issues have been highlighted in relation to point 4.4 consideration should be given to the strategic sites which are yet to be delivered due to viability issues, it is important that an element of affordable housing is delivered on all sites.</p> <p>In relation to point 4.2.2 stalled sites it is essential that landowners are aware of realistic land valuations</p>	<p>Comment Noted</p> <p>The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites and agreed assessment methodology.</p>	<p>No change required to the LDP Review Report</p>
<b>Home Builders Federation (DRR010)</b>	<p>The HBF agrees that the main issues have been identified but does not necessarily agree with the reasons given by the council for the cause of them. In particular the suggestion that the under delivery of houses is due to the capacity of the development industry to bring sites forward.</p>	<p>Agree</p>	<p>Paragraph 4.2.11 has been amended accordingly</p>
<b>Coal Authority (DRR012)</b>	<p>We note that there are no proposals to amend policies M1, M2 and M4</p>	<p>Comment Noted</p>	<p>No change required to the LDP Review Report</p>
<b>Theatres Trust (DRR013)</b>	<p>In terms of the Trust's remit, we support the suggestion that minor amendment is needed to S2 to reflect the cultural element of sustainable development. The Trust considers existing Policy CF3 to be a good one which would benefit from the addition of cultural uses to the existing text.</p>	<p>Noted. It is agreed that given the incorporation of cultural as an additional strand to the definition of sustainable development, amendments to S2 may be required as part of the review of the LDP. Comments on CF3 welcomed, and incorporation of cultural uses will be considered as part of amendments to policy</p>	<p>No change required to the LDP Review Report</p>
<b>Stride Treglown on behalf of Pontypool</b>	<p>N/A</p>	<p>Noted</p>	<p>No change required to the LDP Review Report</p>

Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
<b>College (DRR014)</b>			
<b>Bron Afon (DRR016)</b>	The review identifies the shortfall in delivery again we would welcome exploring how delivery could be accelerated.	Comments noted and agreed.	No change required to the LDP Review Report
<b>Yvonne Walker (DRR017)</b>	The Urban boundary should be narrowed, in order to protect the rural character of the British - SAA5 Renewable energy should be examined thoroughly with open consultation. With the Community	The Council agree that the Urban Boundary will need to be reviewed. Comments noted regarding renewable energy, the regeneration strategy for the site will investigate the potential development options including renewable energy.	No change required to the LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	Yes, however there appears to be very few references to requirements of improving road networks, public transport links and general accessibility to support planned developments.	Comments Noted. The assessment of Candidate sites will consider proposals against various criteria including access by all modes of transport.	No further changes required to the LDP Review Report.
<b>Torfaen Friends of the Earth (DRR021)</b>	S1 Urban Boundaries - Subject to fluctuations (South Sebastopol) S7 - Question whether it is functioning effectively H4 - Agree not being delivered satisfactorily by virtue of viability issues. Perhaps HA implementation will improve delivery H5 & CF4/5 - Protection from planning applications for development needed. Should not be regarded as windfalls C1 & C2 - Green Wedges Policy - does not protect them enough. South Sebastopol was a Green Wedge	These comments are of a detailed nature about the operation of policies from the perspective a pressure group. A review of policies contained in the LDP will be undertaken as part of the LDP review. However, the review will be undertaken on a holistic basis considering all	No change required to the LDP Review Report



Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
		elements of sustainable development.	
<b>Q5. Do you agree with the assessment of the Policy Effectiveness Review?</b>			
<b>Asbri Planning on behalf of Pobl (DRR003)</b>	Under Policy S5 (Housing) there is also a need to make reference to reviewing the merits of retaining existing strategic sites.	Comments noted.  The review of existing allocations will be an issue for the LDP Review alongside the call for candidate sites	No change required to the LDP Review Report
<b>CPRW (DRR004)</b>	I have indicated where CPRW does not agree with the assessments	Comments noted	Addressed under Question 4. No further change required to LDP Review Report
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	Yes. While the review highlights that the plan is not functioning effectively in many areas, this acknowledgement at least provides a sound basis for moving forward positively.	Comments noted and support welcomed	No further change required to LDP Review Report
<b>Cyfoeth Naturiol Cymru / Natural Resources Wales (DRR007)</b>	There is nothing to suggest that your assessment of policy effectiveness (on policies which are relevant to NRW) is inaccurate.	Comments noted and support welcomed	No further change required to LDP Review Report
<b>Torfaen Housing Strategy (DRR009)</b>	Housing fully supports the assessment of the Policy Effectiveness Review	Comments noted and support welcomed	No further change required to LDP Review Report

<b>Representor (Ref. Number)</b>	<b>Representor Comments Summary/ Officer Comments &amp; Recommendations</b>	<b>Officer Comments</b>	<b>Officer Recommendations</b>
<b>Home Builders Federation (DRR010)</b>	The HBF agrees with the issues identified but suggests that strategic policy:- S2 should be amber colour as the text identifies the need for changes to align with the WBFGA. SAA5 the British site should be amber colour as although progress has been made this is 'behind' what was envisaged.	Comments noted and agreed	LDP Review Report amended in light of comments
<b>Coal Authority (DRR012)</b>	No specific comments to make	Noted	No further change required to LDP Review Report
<b>Theatres Trust (DRR013)</b>	No comment	Noted	No further change required to LDP Review Report
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	N/A	Noted	No further change required to LDP Review Report
<b>Bron Afon (DRR016)</b>	N/A	Noted	No further change required to LDP Review Report
<b>Yvonne Walker (DRR017)</b>	The British is now under Council ownership. The making clean & green policy should be made, since development is totally unsuitable. There is not enough money to develop the site. Emphasis should be made to preserve its unique heritage and make it a wildlife zone that everyone can enjoy in future.	Comments Noted	No further change required to LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	Comments: Yes, based on current knowledge	Comments noted and agreed	No further change required to LDP Review Report
<b>Torfaen Friends of the Earth (DRR021)</b>	See Question 4 also S1 - Large Housing developments should have school provision, particularly in primary to alleviate traffic movement and pollution S3 - House design imperative - solar panels on all new homes and schools and industrial buildings. Solar farms would not be necessary, reducing land take.	Comments noted	No further change required to LDP Review Report Issues raised to be considered as part of review of the LDP

Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
	M3 - Policy M3 Tirpentwys site should be removed from allocation		
<b>Q6. Do you agree that the LDP needs to be revised? If so do you consider the Full procedure or short form should be followed?</b>			
<b>Asbri Planning on behalf of Pobl (DRR003)</b>	<p>It is clear that the LDP needs to be revised as it has not delivered sufficient market and affordable housing. It is noted in the Report that the Welsh Government have informally advised against a Short Form LDP Review and recommended that a Full Review of the LDP is undertaken.</p> <p>Paragraph 6.10 states that if a full review of the Torfaen LDP was commenced in 2018 it is considered a new plan could potentially be adopted by December 2021; 9 months after the current LDP end date of 31st March 2021. The actual timescale is difficult to predict; but officer's best estimate is circa 3½ years (June 2018 - December 2021). The Council will do everything possible to ensure that the period of no plan coverage is kept to a minimum and to get the plan to an advanced stage by the 'drop dead' date.</p> <p>The above timescale is ambitious and if it is to be achieved work needs to start immediately in terms of seeking expressions of interest and engaging with potential developers.</p> <p>In progressing the Plan Review the Council should also seek to create a climate which would favour early planning applications on strategic sites in advance of Replacement LDP adoption. This approach has been applied in Swansea to demonstrate to LDP inspectors at the current Examination that progress on delivery of the larger allocations is underway.</p>	Comments Noted. This is a detailed procedural matter which will be address as part of the Delivery Agreement.	No further changes required to the LDP Review Report.
<b>CPRW (DRR004)</b>	We feel unqualified to have an opinion	Noted	No further change required to LDP Review Report
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	Yes. In view of the significant shortfalls in the effectiveness of the plan's policies in key areas including urban boundaries, housing, affordable housing, employment and economy, waste management and buildings of importance, there is a need for a strategic change rather than minor amendment to limited topics.	Comments Noted and welcomed	No further change required to LDP Review Report
<b>Cyfoeth Naturiol Cymru /</b>	We support a full review	Comment noted and support welcomed	No change required to the LDP Review Report

<b>Representor (Ref. Number)</b>	<b>Representor Comments Summary/ Officer Comments &amp; Recommendations</b>	<b>Officer Comments</b>	<b>Officer Recommendations</b>
<b>Natural Resources Wales (DRR007)</b>			
<b>Torfaen Housing Strategy (DRR009)</b>	Housing confirms that the LDP review should commence and a full review be undertaken	Comments Noted	No further changes required to the LDP Review Report.
<b>Home Builders Federation (DRR010)</b>	The HBF supports the Councils view that the review of the plan should be a Full Review.	Comments and support welcomed	No further change required to LDP Review Report
<b>Coal Authority (DRR012)</b>	No specific comments to make	Noted	No change required to the LDP Review Report
<b>Theatres Trust (DRR013)</b>	No comment	Noted	No further change required to LDP Review Report
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	N/A	Noted	No further change required to LDP Review Report
<b>Bron Afon (DRR016)</b>	The aspirations of the policy are sound but enabling the policy to bring about delivery remains challenging for most local authorities.	Noted	No further change required to LDP Review Report
<b>Yvonne Walker (DRR017)</b>	Yes.	Comments noted and welcomed	No further change required to LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	Agree the LDP needs to be revised. Suggest the short form Torfaen LDP revision based on the potential implications on Torfaen arising from the implementation of the Torfaen Well-being plan and advances arising from the Cardiff City Region Deal. A short review should allow TCBC to make necessary amendments and	Comments noted however, sections 6.7 to 6.9 of the draft review report identified why in the	No further change required to LDP Review Report

Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
	continue to deliver on objectives in the short term, whilst being cognisant of developments in other Local Authorities areas, as well as the embedding of Well-being of future generations Act 2015.	Council's view a short form review would not be suitable. A full LDP review will enable an LDP that takes account of neighbouring authorities LDP's and the Well-being of future generations Act 2015 requirements.	
<b>Torfaen Friends of the Earth (DRR021)</b>	We agree that the LDP needs to be revised. We consider a Full review should be followed. We consider that to minimise the risk of Torfaen having no LDP in place that an individual and not a Joint LDP should be pursued. We further believe that would allow the LDP authority to obtain fuller knowledge/local plan requirements to enter into more effective collaboration	Comments Noted	No further changes required to the LDP Review Report.
<b>Q7. If you consider a Full Review should be undertaken do you think that the Council should undertake a Full Review of the Torfaen LDP as well as collaborating on the production of the Cardiff City Region Strategic Development Plan?</b>			
<b>Asbri Planning on behalf of Pobl (DRR003)</b>	There is no reason why the two exercises could not be carried out in parallel, with an appropriate level of assessment undertaken on the potential strategic releases such as Cefn Perthy.	Noted	No further change required to LDP Review Report
<b>CPRW (DRR004)</b>	Pass	Noted	No further change required to LDP Review Report
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	A full review should be undertaken	Comments Noted	No further change required to LDP Review Report
<b>Cyfoeth Naturiol Cymru / Natural Resources</b>	We consider it would be sensible for you to collaborate on the production of a Cardiff City Region SDP	Comments Noted	No further change required to LDP Review Report

<b>Representor (Ref. Number)</b>	<b>Representor Comments Summary/ Officer Comments &amp; Recommendations</b>	<b>Officer Comments</b>	<b>Officer Recommendations</b>
<b>Wales (DRR007)</b>			
<b>Torfaen Housing Strategy (DRR009)</b>	Housing supports a full LDP review being undertaken and for TCBC to collaborate on the CCRSD however given the undetermined timescales for the City region SDP it is essential that TCBC continues to deliver the LDP to ensure they have plan coverage following the drop dead date of the current LDP.	Comments Noted	No further changes required to the LDP Review Report.
<b>Home Builders Federation (DRR010)</b>	The HBF supports the idea of an SDP for the Cardiff City Region and see no reason why Torfaen should to be part of an SDP. The evidence base for the Torfaen LDP review would still be needed to inform any SDP that may come forward.	Comments Noted	No further changes required to the LDP Review Report.
<b>Coal Authority (DRR012)</b>	No comments	Noted	No further change required to LDP Review Report
<b>Theatres Trust (DRR013)</b>	No comment	Noted	No further change required to LDP Review Report
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	N/A		
<b>Bron Afon (DRR016)</b>	No comments	Noted	No further change required to LDP Review Report
<b>Yvonne Walker (DRR017)</b>	A full review should be undertaken.	Comments Noted and supported	No further change required to LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	No comment	Noted	No further change required to LDP Review Report
<b>Torfaen Friends of the</b>	A full review of the Torfaen LDP only as a delay would not be in Torfaen's interests particularly if the Cardiff Region is delayed any further beyond its expected delivery	Comments Noted	No further change required to LDP Review Report

Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
Earth (DRR021)			
<b>Q8 - If you consider a Full Review should be undertaken should this be for an individual LDP for Torfaen or a Joint LDP? Please give reasoning. (see Section 6)</b>			
<b>Asbri Planning on behalf of Pobl (DRR003)</b>	<p>Much depends on the level of agreement from the constituent local authorities, who have differing levels of housing land supply along with specific urban/rural characteristics.</p> <p>It may be advantageous however, to consider future areas of growth throughout the former County of Gwent as it is known for example, that the market towns of Monmouthshire are constrained in terms of future growth. Furthermore once the brownfield sites in Newport are exhausted there is no obvious direction for the future expansion of the City.</p>	Comments Noted	No further change required to LDP Review Report given the letter from the Cabinet Secretary to Torfaen dated 29 <sup>th</sup> March in relation to preparation of a Torfaen LDP.
<b>CPRW (DRR004)</b>	Without evidence at this stage, I feel a Joint LDP should be a more logical step towards regional planning	Comments Noted	No further change required to LDP Review Report given the letter from the Cabinet Secretary to Torfaen dated 29 <sup>th</sup> March in relation to preparation of a Torfaen LDP.
<b>Mango Planning on behalf of Pontypool Park Estates (DRR005)</b>	This would be dependent on with whom a joint LDP was drafted.	Comments Noted	No further change required to LDP Review Report given the letter from the Cabinet Secretary to Torfaen dated 29 <sup>th</sup> March in relation to preparation of a Torfaen LDP.
<b>Cyfoeth Naturiol Cymru /</b>	From our perspective, it would be beneficial if you undertook a Joint LDP with neighbouring authorities. Not only would this reduce resources NRW commits to	Comments Noted	No further change required to LDP Review Report given

<b>Representor (Ref. Number)</b>	<b>Representor Comments Summary/ Officer Comments &amp; Recommendations</b>	<b>Officer Comments</b>	<b>Officer Recommendations</b>
<b>Natural Resources Wales (DRR007)</b>	local development plans across the region, but many of our strategic planning interests are better considered on a 'more than local' wide level.		the letter from the Cabinet Secretary to Torfaen dated 29th March in relation to preparation of a Torfaen LDP.
<b>Torfaen Housing Strategy (DRR009)</b>	Housing considers TCBC should continue to deliver an individual LDP given its current LDP end date of March 2021, delivering a joint LDP would likely increase timescales of the completion of the review due to the inability to align reporting timescales across the varying LA's. This would put TCBC at risk of having plan coverage for a significant time period. It should also be noted that sub regional work undertaken on LDP full review is likely to duplicate work which will be undertaken for the SPD.	Comment noted	No change required to the LDP Review Report
<b>Home Builders Federation (DRR010)</b>	The HBF supports the Council moving forward with their review at the earliest opportunity to avoid any unnecessary policy vacuum' once the plan reaches its end date. The current lack of decision over an SDP for the Cardiff City Region is frustrating and we would question the benefit in moving forward with a joint plan if an SDP is proposed.	Comment noted and support welcomed	No change required to the LDP Review Report
<b>Coal Authority (DRR012)</b>	No comments	Noted	No further change required to LDP Review Report
<b>Theatres Trust (DRR013)</b>	No comments	Noted	No further change required to LDP Review Report
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	N/A	Noted	No further change required to LDP Review Report
<b>Bron Afon (DRR016)</b>	No comments	Noted	No further change required to LDP Review Report



Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
<b>Yvonne Walker (DRR017)</b>	If planning costs can be saved by collaborating with another authority, then that would be beneficial. However, we should not have our local planning issues dictated by an outside authority	Noted	No change required to the LDP Review Report
<b>South Wales Fire and Rescue (DRR018)</b>	No comment	Noted	No further change required to LDP Review Report
<b>Torfaen Friends of the Earth (DRR021)</b>	Please see Question 6	Noted	No further change required to LDP Review Report
<b>Additional Comments</b>			
<b>Pantygasseg Resident Association (DRR002)</b>	Wish to consider their letter of 11 <sup>th</sup> July 2017 be considered as part of the LDP Review. The residents association request that Policy M3 (Tir Pentwys Preferred Area of Search) be deleted from the LDP as soon as possible as part of the LDP Review. The Councils Planning committee unanimously refused the planning application, which if succeeded would have led to the realisation of Policy M3. The letter identifies the primary reason for refusal was the inadequacy of the access road through ancient woodland and since over 13 years have been spent attempting to find an alternative route and it is unlikely that a better alternative can be found. The Council has clearly indicated that it is opposed to quarrying at Tirpentwys cut and this must mean to the Council Policy M3 has no further purpose. The LDP inspector placed such importance on the possibility of the practical realisation of M3 he walked the entire route, which indicates he though this route might be possible, but the Council has now decided otherwise based on recent specialist advice. The Council will be defending its decision, if there is an appeal, but there is no need to await for an appeal before deleting M3. The Council has made its view clear and given there is no feasible access route, Policy M3 is now in conflict with the Councils view as expressed by its considered decision on the planning application. Furthermore we understand that the WG requirement which resulted in policy M3 being originally thought necessary has now been rescinded.	The comments are noted and the letter will be taken into account as part of the review of the LDP. The Torfaen LDP remains in force until the 31 <sup>st</sup> March 2021 or until it is superseded by one of the above development plan review options. There is no suitable legal way to delete Policy M3 in the interim.	No further action to inform the review report but Policy M3 to be reviewed as part of the LDP.

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<b>Asbri Planning on behalf of Pobl (DRR003)</b>	<p>The emphasis is on the need for early engagement, particularly in circumstances where proposals are being formulated for potential large scale releases and where Pre-Application procedures are not yet relevant.</p> <p>For this reason the exercise is regarded by the Pobl Group as an opportune time to submit initial thoughts as to how an appropriate form of development could be delivered at the Cefn Perthy site.</p>	<p>The comments are noted. New strategic sites for the LDP will be considered as part of a new plan. The review of new and existing allocations will be an issue for the LDP alongside the call for candidate sites and agreed assessment methodology.</p>	<p>No further change required to LDP Review Report</p>
<b>CPRW (DRR004)</b>	<p>CPRW increasingly receives pleas for help in opposing LDP developments (this branch of CPRW covers, or tries to cover, four LAs). We appreciate national policies are often the driving force, but we also feel, especially in Torfaen, that engagement and consultation with residents and communities are hopelessly inadequate, and more than that, local political policies often appear to be anti-environmental. I would mention the South Sebastopol fiasco, and, as above, the unbelievable planning committee decision to take away the informal play and amenity area in St Cadocs as examples. CPRW believes that the planning process in Wales is currently not fit for purpose, LAs should resist pressures from national government and developers much more, and prioritise looking after, and working for, their own communities. We are sure that it would be possible to cater for local growth and employment without the gross expansion of greenfield destruction evident in the current Torfaen LDP, if new approaches were considered. The experience of the aborted Caerphilly Replacement LDP should be a lesson in local democracy.</p>	<p>Comments noted. Revised LDP will be developed through national planning legislation. Community Involvement Scheme will be part of new delivery agreement. Issues for extent and location of future growth are for new plan.</p>	<p>No further change required to LDP Review Report</p>
<b>Cyfoeth Naturiol Cymru / Natural Resources Wales (DRR007)</b>	<p>As referenced in 2.11, we are expected to produce Area Statements under the Environment Act. The South-East Wales Area Statement is currently being developed and is due to be finalised in 2019. This may be too late to inform your evidence base, however, we will assist you in ensuring the LDP takes account of the Statement as much as possible. We also advise that allocated sites being considered in a full review LDP, including sites allocated in the current LDP should be reassessed using the most up to date data. To help you in screening sites initially, we refer you to 'Lle' (Geoportal for Wales). This serves as a hub for data</p>	<p>Comments noted</p>	<p>No further change required to LDP Review Report</p>

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	and information covering a wide spectrum of topics, but primarily around the environment. <a href="http://www.lle.gov.wales">www.lle.gov.wales</a>		
<b>Home Builders Federation (DRR010)</b>	2.30 What evidence is there to suggest that Help to buy drives house price growth? Help to buy has if anything driven an increase in sales particularly to first time buyers and an associated increase in house building. There is a general acceptance that increasing house building will help to limit house price growth.	Morgan Stanley Report – ‘The Help to buy premium’ 2017.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	3.6 ‘Housing land supply’ there is no need for the wording in brackets so they should be deleted.	Factually correct and explains position.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	Under the final bullet point ‘Delivery of Strategic Housing Sites’ further explanation is required explaining why these sites have not come forward as planned.	Sites have not come forward as planned and reasons are given in 4.4.1.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	4.2.9 Does the evidence show just slow housing delivery, it may also be affected by how long it has taken to get the planning permission and discharge the conditions so that development can actually start? At Figure 10 details of why sites have not come forward are included and very few suggest that developers are delaying the delivery of sites, many seem to be down to landowner choices/ changes of intentions.	Planning permissions and discharge of conditions will take time if the schemes submitted require amendment or are lacking in detail or quality. Landowner delays are part of the development process.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	4.2.15 There is no reason to include this section, the method of calculation is fixed by the WG TAN1 document, this is not the document in which to challenge this approved approach, it should be removed.	Details provided for information. Formalised TAN1 process does not cover all issues relating to housing land supply.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	4.2.16 HBF consider this to be an unfair statement as there are many reasons why sites do not come forward as the Council except it is not just about the capacity of the development industry ( see Figure 10 of document). Again the calculation method does not need to be mentioned.	Para says ‘also’. Sites have not come forward as planned. Plan is to be reviewed - Reasons for sites not coming forward detailed in 4.4.1 and will	No further change required to LDP Review Report

Representor (Ref. Number)	Representor Comments Summary/ Officer Comments & Recommendations	Officer Comments	Officer Recommendations
		be assessed as part of new plan.	
<b>Home Builders Federation (DRR010)</b>	4.2.17 The plan includes an allowance for windfall sites so how do the consents referenced in Figure 6 compared to the windfall allowance in the plan. HBF would suggest that there is a difference between windfall sites (normally sites within the settlement boundary that were not allocated for housing but due to a change in circumstances become available for development during the plan period) and the sites that might be allowed by the Council as a result of not having a five year land supply as these are usually sites outside of the settlement boundary which are not allocated but are complaint with policy. This needs to be clarified in this paragraph.	Sites have not come forward as planned. Plan is to be reviewed - Reasons for sites not coming forward and role of windfall sites will be assessed as part of new plan.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	4.2.18 This paragraph covers two very separate issues which should be made clear and expanded on. Firstly the review of any unimplemented sites particularly those which have been rolled over from a previous plan is critical, particularly now that WG are indicating in the draft PPW edition 10, currently out to consultation, that site viability should be given much greater consideration earlier in the plan process. Secondly greater explanation needs to be given to the statement that the plans underperformance 'means that the level of housing growth as part of the replacement LDP will need to be reviewed'. WG guidance on plan preparation makes it quite clear that the level of housing growth should be based on evidence, with the latest available household projections as a starting point. As the Minister Lesley Griffiths stated in Plenary in 2016 'TAN 1 provides Local Planning Authorities (LPAs) with a clear methodology for monitoring the housing land supply to meet the requirements they have identified in their Local Development Plans (LDPs)'. A lack of a five year land supply is not a reason to reduce the level of housing required.	Agree on process of determining housing growth based on evidence. Ensuring a 5 year housing land supply in the future is a key factor in determining the level of housing.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	4.2.20 The HBF suggests an additional issue should be considered in this general paragraph relating to the under delivery of the previous plan. There should at least be a statement as to whether or not this is to be given any consideration/allowance in the future calculation of need.	Future position will be assessed in relation to preparing new plan.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	4.3.16 The open space study should include details of where existing Council owned open space has been lost and the reason why.	Future position will be assessed in relation to preparing new plan.	No further change required to LDP Review Report

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<b>Home Builders Federation (DRR010)</b>	5.2 The HBF question whether or not four years is really realistic based on the time it has taken many plans in Wales to be adopted, there are far less resources available and although the HBF is aware of a lot of joint working relating to the evidence base, we are not convinced that this will necessarily speed up the development of the evidence base/ delivery of the plan.	Challenging timescale with limited resources. Draft timetable shows how plan is envisaged to come forward	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	6.1 The HBF notes that recent answers to questions in Plenary by both the First Minister and the Minister for Local Government indicate that the white paper proposals will not be brought forward in their current form.	Future position will be assessed in relation to preparing new plan.	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	6.19 As mentioned in our comments on para. 5.2 HBF is not aware of any evidence which would indicate that the joint working on the evidence base will necessarily save time.	Joint working shares limited resources where appropriate and in certain tasks is already providing assistance	No further change required to LDP Review Report
<b>Home Builders Federation (DRR010)</b>	6.21 This section should be reworded as it is currently not clear what issue stakeholder's views are being sought on. Although the HBF consider it appropriate to collect stakeholders views they are unlikely to impact on the decisions in terms of joint working as this is only a decision that can be made by the LPA's who are proposing to work jointly together.	Position relating to joint working is evolving. Future position will be assessed in relation to preparing new plan.	No further change required to LDP Review Report
<b>Coal Authority (DRR012)</b>	As you will be aware the Torfaen area has significant coal mining legacy, in form of 1464 mine entries, recorded and likely unrecorded coal workings at shallow depth and recorded surface hazards.  The Coal Authority provides the LPA with downloadable data in respect of Development Risk and Surface Coal Resource Plans. We would expect any potential site allocations to be considered against this information in order to ensure that any potential constraints or issues are identified at an early stage in the process.	Comments Noted.	No further change required to LDP Review Report
<b>Stride Treglown on behalf of Pontypool College (DRR014)</b>	The review of the allocated sites within the 7 Strategic Action Areas is understood and it is agreed that such a review is required to assist the LDP review process. The traffic light system used to denote the progress of the allocated sites through the LDP system is also accepted as a useful way to measure the progress of the allocated sites, although a thorough review and updating process is required before sites are finally removed as allocations from the LDP.	Disagree – No evidence has been provided to support that the site will be developed within the plan period (prior to 2021). If resolutions are forthcoming the site can	No further change recommended to LDP Review Report

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	<p>We therefore make representations to the LDP Draft Review Report on behalf of Coleg Gwent and highlight that the housing allocation at Pontypool College (Allocation H2/3), currently identified as red within the review report, should remain as a housing allocation within any review of the LDP. It is recognised that until recently no obvious progress has been made in bringing this site forward. However, a key decision made by Welsh Government in the early part of 2018 has meant that Coleg Gwent are now in a position to start marketing the site, thus making it a realistic and deliverable housing site that could provide housing within the LDP period.</p> <p>As you maybe aware, the Welsh Government decision related to the location of sixth form provision within Torfaen CBC. The decision was to provide sixth form education at a dedicated centrally provided sixth form centre (a joint venture with Coleg Gwent) and that existing sixth form provision within schools would be closed. This decision has meant that Coleg Gwent have evaluated the services provided at the Pontypool campus, some of which are better suited to be accommodated within the new sixth form centre. As a result, this leaves a limited number of facilities / services at the Pontypool Campus. These facilities could be accommodated at other Coleg Gwent campus'. The final decision on the re-location of these facilities has yet to be finalised, although it is known that there is sufficient space to absorb these elsewhere. Therefore, due to the recent Welsh Government decision, Coleg Gwent are now reviewing these options and actively looking to bring the site to market in the near future once key baseline survey information has been gathered.</p> <p>For these reasons we ask you to revise the 'red' traffic light assigned to the allocation Pontypool College - H2/3 within the LDP Review Document, to either an amber or green. Depending on interest from the market in the Pontypool Campus, it is highly likely that a planning application for the site could be submitted prior to the finalisation of the LDP Review. Despite the potential for this to occur, Coleg Gwent are keen to safeguard their position and ensure the allocation remains within the LDP, should matters progress faster than the LDP Review process then a decision on its retention within the LDP can be taken at that point. The Pontypool College site presents an opportunity to achieve the objectives for Pontypool as a growth hub and to deliver approximately 140 dwellings.</p>	<p>be progressed as part of the current plan. Unapproved sites can be considered as part of revised plan with evidence to support their deliverability.</p>	

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	On behalf of Coleg Gwent we wish to be kept up to date with the progress of the LDP Review, and has recently occurred we are happy to discuss matters with you yourself should the need arise.		
<b>Bron Afon (DRR016)</b>	It is a conundrum, but reviewing underused industrial land and considering it for future housing may assist TCBC in meeting its targets. Similarly clarity in determining open space requirements is another challenging area. Both of which we are happy to assist with.	Comments Noted. Need for and protection of employment land and open space to be reviewed as part of new plan.	No further change required to LDP Review Report
<b>Yvonne Walker (DRR017)</b>	<p>South Sebastopol (SAA6) is an environmental disaster that I predicted originally in terms of loss of amenity; over-density housing; traffic pollution and footpath closures.</p> <p>SAA2 - A new stone bridge at Bevan's Lane is no substitute for the loss of valuable green space &amp; turning a rural landscape into a ghetto area.</p> <p>M3 - Tir Pentwys - Llanhilleth Common is under threat of being allocated for inappropriate works on the Access Road. Valuable ancient woodland will be destroyed forever. The route will bisect an important bridleway, bisecting the common.</p> <p>The A472 is already a traffic black-spot and the air pollution has already been declared as a high health risk.</p>	<p>Comments noted. These primarily relate to existing planning decisions.</p> <p>Please note that allocation SAA2 for Canalside is not related to South Sebastopol.</p>	No further change required to LDP Review Report
<b>Torfaen Friends of the Earth (DRR021)</b>	No mention of green infrastructure as a principal of land use as an economic resource providing vegetation, water filtering, particularly with regard to mental health and food production possibilities to combat unhealthy eating and lifestyles, natural environment as a healer.	Comments noted. Issues for revised plan.	No further change required to LDP Review Report